## Statement A (con't)

Figure 3-B is the vertical plane (elevation) radiation pattern for the proposed FM antenna. Table 1 is a tabulation of the horizontal plane pattern envelope, including minima and maxima.

# Statement B ALLOCATION CONSIDERATIONS

#### prepared for Howard B. Dolgoff Miramar Beach, Florida

Ch 292A (106.3 MHz) 6.0 KW-DA (H&V) 100 m

The site proposed for use by Howard B. Dolgoff (Dolgoff) meets the separation requirements of Section 73.207 of the FCC Rules with respect to all stations except WKNU, Brewton, Alabama. With respect to WKNU, the reference point for the allotment was fully spaced as a 3 kilowatt facility, but did not meet the 6 kilowatt spacing requirements of Section 73.207. Therefore, with respect to WKNU, this allotment can be considered under Section 73.213 of the FCC Rules.

Dolgoff proposes the use of a new tower near Miramar Beach. This site will meet the distance separation requirements of Section 73.213 towards WKNU (105 km required, 105.2 km actual). Therefore, Dolgoff is requesting processing under Section 73.213 of the FCC Rules. The proposed facility will operate with 6 kilowatts effective radiated power in all directions except towards the 60 dBu contour of WKNU where the directional antenna will limit the power to 3 kilowatts. This is consistent with the provisions of Section 73.213 and the Memorandum Opinion and Order released May 30, 1991 in reconsideration of MM Docket 88-375.

Within the sector of suppression for the directional antenna, contours were calculated at 5° and 10° azimuth increments. Outside that sector, the standard 45-degree spaced radials were employed. For the proposed station, the directional antenna envelope pattern of Figure 3-A was employed, using the specific bearings and radiation values shown in Table 1 of this application. All 60 dB $\mu$  contours were computed using the F(50,50) propagation curves.

Table 2

# Proposed Coverage Contours prepared for Howard B. Dolgoff

Miramar Beach, Florida Ch 292A 6.0 KW-DA (H&V) 100 M

	Effective Antenna	Effective Radiated	Contour Distances	
Azimuth	Height	<u>Power</u>	70 dBu	60 dBu
(deg)	(meters)	(dBK)	(km)	(km)
0.0	94.4	7.8	15.6	27.6
45.0	101.9	7.8	16.4	28.5
90.0	102.0	7.8	16.4	28.6
135.0	98.9	7.8	16.1	28.2
180.0	101.0	7.8	16.3	28.4
225.0	100.8	7.8	16.2	28.4
250.0	100.2	7.8	16.2	28.4
270.0	101.7	7.8	16.3	28.5
280.0	102.0	5.8	14.4	25.8
285.0	102.0	4.8	13.6	24.5
295.0	102.0	4.8	13.6	24.5
305.0	102.0	4.8	13.6	24.5
315.0	98.1	4.8	13.3	24.0
325.0	97.8	4.8	13.3	24.0
335.0	95.2	4.8	13.1	23.7
340.0	94.7	5.8	13.9	24.9
350.0	93.5	7.8	15.5	27.4

Note: 135°, 180°, 225° terrain averages determined between 3 km and land edge. Over water segment excluded.

#### Statement D

#### **ENVIRONMENTAL CONSIDERATIONS**

prepared for Howard B. Dolgoff Miramar Beach, Florida

Ch 292A (106.3 MHz) 6.0 KW-DA (H&V) 100 m

The instant proposal is not believed to have a significant environmental impact as defined under Section 1.1306 of the Commission's Rules. Consequently, preparation of an Environmental Assessment is not required.

#### Nature of The Proposal



This application proposes to locate a new FM station on a new tower to be constructed near Miramar Beach, Florida. The proposed site is not believed to fall under any of the provisions of Section 1.1307(a) which would require preparation of an environmental assessment. The proposed tower is not believed to require use of high-intensity lighting; if the FAA mandates such lighting, shutters will be installed to minimize

#### Statement D (con't)

On a worst case basis, the proposed FM station would cause RF levels at the base of the tower to be 4.2 percent of the applicable ANSI guideline for continuous human exposure. When the elevation pattern of the proposed 4 bay ERI Rototiller antenna is considered, with the manufacturer's calculated maximum downward relative field of 0.200 at depression angles below 55°, the RF energy level near the base of the tower will be less than 0.16 percent of the applicable ANSI exposure guideline. That elevation pattern is shown in Figure 3-B.

In a worst-case analysis, without considering antenna elevation patterns, the facility proposed to be operated at this site will comply with the ANSI guideline. This site complies with Section 1.1306(b) the FCC Rules concerning human exposure to RF energy. Howard B. Dolgoff will ensure that tower access is restricted and that appropriate warning signs are posted on the tower.

With respect to worker safety, the RF energy levels on the tower are expected to be below the ANSI guideline, except when the proposed FM station is operating. Dolgoff will establish a policy to ensure the safety of workers on the tower, and will cooperate with any future tenants in the policy implementation. Dolgoff will take any steps required to protect the safety of tower workers in areas where the guideline may be exceeded as a result of its operation, including but not limited to, time limitations on workers, power reduction or, if necessary, discontinuance of transmissions. This policy will not preclude the use of measurements to establish safe working areas or time limitations on workers.

#### Conclusion

The instant proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules.

### Statement E

#### **EMERGENCY POWER**

prepared for
Howard B. Dolgoff
Miramar Beach, Florida

Ch 292A (106.3 MHz) 6.0 KW-DA (H&V) 100 m

Howard B. Dolgoff proposes to install emergency power generating equipment at both the studio and transmitter to assure continued operation in the event of loss of commercial power.